



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

DEC 13 2016

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

**EPA WARNING LETTER**

Mr. Patrick Bodeau  
Branch Manager  
Crop Production Services, Inc.  
400 Second Street  
Harrington, Washington 99134

Re: Inspection of Risk Management Program (RMP)  
Crop Production Services, Inc. - Harrington WA 320  
EPA RMP Facility ID# 1000 0002 7295

Dear Mr. Bodeau:

On July 13, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Crop Production Services, Inc. (320) facility located at 400 Second Street in Harrington, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Safety Information:** Crop Production Services, Inc. failed to compile and maintain up-to-date safety information on the maximum intended inventory of equipment in which the regulated substances are stored or processed, as required by 40 C.F.R. § 68.48(a)(2). Crop Production Services, Inc. did not include tanker railcar storage in their reported maximum intended inventory for anhydrous ammonia and ammonia (concentration 20% or greater) in their June 9, 2014 RMP submission. On August 9, 2016, Crop Production Services, Inc. submitted an RMP resubmission correcting the maximum intended inventory that includes tanker railcar storage for anhydrous ammonia and ammonia (concentration 20% or greater).
2. **Maintenance:** Crop Production Services, Inc. failed to perform inspections and tests on process equipment that follow recognized and generally accepted engineering practices, as required by 40 C.F.R. § 68.56(d). Crop Production Services, Inc. was unable to provide inspection documentation for the tanker railcar loading system for anhydrous ammonia and ammonia (concentration 20% or greater).

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator  
U.S. EPA Region 10  
1200 Sixth Avenue, Suite 900, OCE-101  
Seattle, WA 98101  
Fax: (206) 553-4743

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: <http://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>.

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or [morales.javier@epa.gov](mailto:morales.javier@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Kelly McFadden", with a long horizontal flourish extending to the right.

Kelly McFadden, Manager  
Pesticides and Toxics Unit